

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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DANIEL LOVELACE AND HELEN  
LOVELACE

Plaintiffs,

vs.

PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
DR. BABU RAO PAIDIPALLI &  
DR. MARK P. CLEMONS

Defendants.

Case No. 2:13-CV-02289-JPM-dkv

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**METHODIST HEALTHCARE – MEMPHIS HOSPITALS' MOTION FOR  
PROTECTIVE ORDER**

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COMES NOW non-party Witness Methodist Healthcare – Memphis Hospitals (“Methodist”), by and through undersigned counsel, and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, files this Motion for Protective Order to designate certain documents requested in Plaintiffs’ December 30, 2014 subpoena issued to Methodist as confidential and limit disclosure of said documents as specified in the Proposed Protective Order. In support of its Motion, Methodist relies upon its contemporaneously filed Memorandum of Law in Support of this Motion and the entire record in this case.

Respectfully submitted,

s/ Craig C. Conley

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**CERTIFICATE OF CONSULTATION**

Pursuant to Fed. R. Civ. P. 26(c)(1) and Local Rule 7.2(a)(1)(B), I hereby certify that, on January 8, 2015, counsel for Methodist conferred with counsel for all parties via e-mail concerning the contents of this Motion, and all counsel agrees to the entry of the Proposed Protective Order.

s/ Craig C. Conley

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 8th day of January, 2015, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notification to the attorneys of record in this matter who are registered with the Court's CM/ECF system.

s/ Craig C. Conley